

TANASI LAW OFFICES
8716 Spanish Ridge Ave., Ste. 105
Las Vegas, Nevada 89148
702-906-2411 • Fax 866-299-5274

RICHARD E. TANASI, ESQ.

Nevada Bar No. 9699

TANASI LAW OFFICES

8716 Spanish Ridge Ave., Ste. 105

Las Vegas, NV 89148

Telephone: (702) 906-2411

Facsimile: (866) 299-5274

Email: rtanasi@tanasilaw.com

Attorney for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF NEVADA,

Plaintiff,

vs.

DARRYL JULIUS POLO, et al

Defendant.

Case No: 2:22-cr-0030-RFB-DJA

STIPULATION AND ORDER
TO MODIFY CONDITIONS OF PRE-
TRIAL RELEASE

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by and through KENNETH A. POLITE, JR. Assistant Attorney General, MATTHEW A. LAMBERTI, JASON FRIERSON, United States Attorney, RICHARD ANTHONY LOPEZ, Assistant United States Attorney, and DARRYL POLO, by and through his attorney, RICHARD E. TANASI, ESQ., that Mr. Polo's conditions of pre-trial release pending self-surrender be modified to allow Mr. Polo to travel to Lake Mary, Florida and Margate, Florida from May 4, 2023 through and including May 11, 2023, for the purpose of attending his cousin's wedding.

///

///

1 Pursuant to General Order No. 2007-04, this Stipulation is entered into for the following
2 reasons:

3 1. Mr. Polo is currently scheduled to report for self-surrender seven (7) days after the
4 date trial ends for Mr. Polo's co-defendants in this matter. [ECF No. 27.] Trial is currently set
5 for September 11, 2023.

6
7 2. Mr. Polo requests his conditions of pre-trial release pending self-surrender be
8 modified to allow him to travel to Lake Mary, Florida and Margate, Florida from May 4, 2023
9 through and including May 11, 2023, for the purpose of attending his cousin's wedding.

10 3. Pretrial Services does not oppose this request.

11 ///

12
13
14
15
16
17 ///

18
19
20
21
22
23 ///

1 **WHEREFORE**, the parties respectfully request that this Honorable Court accept the
2 Stipulation and enter an Order as set forth below, allowing Mr. Polo's conditions of pre-trial
3 release pending self-surrender be modified to allow Mr. Polo to travel to Lake Mary, Florida
4 and Margate, Florida from May 4, 2023 through and including May 11, 2023, for the purpose of
5 attending his cousin's wedding.
6

7 DATED this 27th day of March 2023.

8 U.S. ATTORNEY'S OFFICE

9 /s/ Richard Anthony Lopez

10 JASON FRIERSON

United States Attorney

11 RICHARD ANTHONY LOPEZ

JESSICA OLIVA

12 Assistant United States Attorneys

Office of the United States Attorney

13 501 South Las Vegas Blvd., Suite 1100

14 Las Vegas, Nevada 89101

Tel.: 702-388-6336

15 tony.lopez@usdoj.gov

16 jessica.oliva@usdoj.gov

Attorneys for the United States

17 /s/ Matthew Lamberti

18 KENNETH A. POLITE, JR.

Assistant Attorney General

19 MATTHEW A. LAMBERTI

20 Senior Counsel

MICHAEL CHRISTIN

21 Trial Attorney

Computer Crime and Intellectual Property Section

22 United States Department of Justice

23 1301 New York Avenue, NW, Suite 600

Washington, DC 20530

24 Tel.: 202-514-1026

25 matthew.lamberti@usdoj.gov

michael.christin@usdoj.gov

26 *Attorneys for the United States*

27 /s/ Richard Tanasi

28 RICHARD E. TANASI, ESQ.

Attorney for the Defendant

TANASI LAW OFFICES

8716 Spanish Ridge Ave., Ste. 105

Las Vegas, Nevada 89148

702-906-2411 • Fax 866-299-5274

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF NEVADA,
Plaintiff,
vs.
DARRYL JULIUS POLO, et al
Defendant.

Case No: 2:22-cr-0030-RFB-DJA

ORDER
TO MODIFY CONDITIONS OF PRE-
TRIAL RELEASE

This matter coming before the Court on Stipulation to Modify Conditions of Pre-Trial Release, the Court having considered the matter, and good cause showing, the Court accepts the Stipulation.

WHEREFORE, IT IS HEREBY ORDERED, that Mr. Polo's conditions of pre-trial release pending self-surrender shall be modified to allow Mr. Polo to travel to Lake Mary, Florida and Margate, Florida from May 4, 2023 through and including May 11, 2023, for the purpose of attending his cousin's wedding.

IT IS FURTHER ORDERED THAT all remaining conditions of Mr. Polo's pre-trial release remain in full force and effect.

DATED: March 29, 2023.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

TANASI LAW OFFICES
8716 Spanish Ridge Ave., Ste. 105
Las Vegas, Nevada 89148
702-906-2411 • Fax 866-299-5274